#### Annual 47 C.F.R. § 64.2009(e) CPNI Certification

Received & Inspected

#### **EB Docket 06-36**

FEB 2 5 2009

FCC Mail Room

Annual 64.2009(e) CPNI Certification for 2009

Date filed: February 20, 2009

Name of company(s) covered by this certification: See attached list

Form 499 Filer ID: see attached list

Name of signatory: Shirish Lal

Title of signatory: Vice President of Marketing

I, Shirish Lal, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

If affirmative:

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

If affirmative:

Cianad

	Centu	ryTel,	Inc.	•		05/23/06
	Comp	any N	ames as of M	ay 2006	G VRPPILISTYLIST	XLS LIST-By co
	•		Study Area Code	· ·		
			(6 digits)		<del></del>	
[	Telco	CTL	OCN-Op. Co.#		1 : 1	Filer 499/
	1		'	COMPANY NAME	STATE(S)	TRS#
1	Count 1	# T032	(last 4 digits) 442117	CenturyTel of Port Aransas, Inc.	ŢX	804156
	2	T033	290557	CenturyTel of Claiborne, Inc.	ŤN	B04159
		T035	270423	CenturyTel of Central Louislana, LLC	LA	804162
	3			·	AR	804165
	4	T039	401711	CenturyTel of Mountain Home, Inc.	MS	804168
	5	T042	280458	CenturyTel of North Mississippi, Inc.	ÅЯ	804171
	6	T044	401705	CenturyTel of Arkansas, Inc.		
	7	T046	270436	CenturyTel of North Louisiana, LLC	ĻĄ	804174
	8	T048	270440	CenturyTel of East Louisiana, LLC	ĹA	804177
	9	T049	401727	CenturyTel of South Arkansas, Inc.	AR, LA	804180
	10	T051	270424	CenturyTel of Southeast Louislana, LLC	LA	804183
	11	T056	270434	CenturyTel of Evangeline, LLC	L.A	804186
	12	T057	270442	CenturyTel of Southwest Louislana, LLC	ĻA	804189
	13	T059	270431	CenturyTel of Northwest Louisiana, Inc.	LA, AR, TX	804198
	14	T061	320801	CenturyTal of Odon, Inc.	IN	804192
	15	T065	320747	CenturyTel of Central Indiana, Inc.	IN	804195
	16	T069	310671	CenturyTel of Midwest - Michigan, Inc.	MI	804201
	17	T070	330895	CenturyTel of Wisconsin, LLC	χVI	804204
	18	T072	330931	CenturyTel of Southern Wisconsin, LLG	wı	805725
	19	T073	330877	CenturyTel of Fairwater-Brandon-Alto, LLC	WI	803583
	20	T079	351126	CenturyTel of Chester, Inc.	IA	804207
					ID	804210
	21	T083	472225	CenturyTel of Adamentification	TN	804213
	22	T085	290552	CenturyTel of Adamsville, Inc.		
	23	T087	401720	CenturyTel of Redfield, Inc.	AR	804216
				CenturyTel of Northwest Ark, LLC (legal entity for T090 & T091)		803998
	24	T090	401142	GenturyTei of Russellville	AR, MO, OK	]
	25	T091	401143	CenturyTel of Slioam Springs	AR, OK	
				CenturyTel of Central Ark, LLC (legal entity for T093 & T094)	ł	820918
	28	T093	401144	CenturyTel of Mammoth Spring	AR	\ \ \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\
	27	T094	Ĺ	CenturyTel of Jacksonville	AR	
	28	T095	421151	Spectra Communications Group, LLC	MO	820461
	29	T096	331155	Telephone USA of Wisconsin, LLC	WI	820906
	30	T098	331159	CenturyTel of Central Wisconsin, LLC	WI	820908
	31	T100	310702	CenturyTel of Michigan, Inc.	IM,	804219
			330884	CenturyTel of Forestville, LLC	WI	804222
	32	T105			WI	804225
	33	T106	330898	CenturyTel of Larsen-Readfield, LLC		
	34	T108	330913	CenturyTel of Monroe County, LLC	WI	804228
	35	T109	330950	CenturyTel of Northwest Wisconsin, LLC	WI	804231
	38	T110	462208	CenturyTel of Colorado, inc.	CO	804234
	37	T111	330956	CenturyTel of Northern Wisconsin, LLC	WI ,	804237
				CenturyTel of the Southwest, Inc. (legal entity for T112 & T114)		817886
	38	T112	492274	CenturyTel of the Southwest (New Mexico)	NM {	ļ .
	39	T114	452175	CenturyTel of the Southwest (Arizona)	AZ	
	40	T119	290574	CenturyTel of Ooltewah-Collegedale, Inc.	TN	804246
	41	T120	300630	CenturyTel of Ohlo, Inc.	ОН	804249
	42	T121	270427	CenturyTel of Chatham, LLC	LA	804252
	43	T125	442140	CenturyTel of San Marcos, Inc.	TX	804255
	44	T127		CenturyTel of Northern Michigan, Inc.	MI	804256
	45	T137	442101	CenturyTel of Lake Dallas, Inc.	TX	802890
					LA	804759
	46	T140	270439	CenturyTel of Ringgold, LLC		
	47	T141		CenturyTel of Washington, Inc.	WA	806259
	48	T142		CenturyTel of Inter-Island, Inc.	WA	806260
	49	T143	522410	GenturyTel of Gowiche, Inc.	WA	807099
	50	T144	1	CenturyTel of Eastern Oregon, Inc.	OR	806263
	51	T145	2395	CenturyTel of Oregon, Inc.	OR	806262
	52	T146		CenturyTel of Montana, Inc.	MT	806265
				CenturyTel of the Gem State, Inc. (legal entity for T147 & T148)	ſ	817854
	53	T147	552223	CenturyTel of the Gem State (Nevada)	NV	
	54	T148	472223	CenturyTel of the Gem State (Idaho)	ID	1
	55	T149	462185	CenturyTel of the Genn State (Idano)	CO	806277
	58	T150	512299	Century Tel of Eagle, Inc. Century Tel of Wyoming, Inc.	WY	
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	ET	T156	330922	CenturyTel of the Midwest-Wisconsin, LLC (legal-entity for T156-T161)	,	817862
	<b>67</b>			CenturyTel of the Midwest-Wisconsin (Northwest)	WI	
	58	T157	330841	CenturyTel of the Midwest-Wisconsin (Cencom)	Wi,	1
	59	T158	330934	CenturyTel of the Midwest-Wisconsin (Platteville)	WI \	Ì
	60	T159	330959	CenturyTei of the Midwest-Wisconsin (Thorp)	wı	
	61	T160	330857	CenturyTel of the Midwest-Wisconsin (Casco)	WI	
	62	T161	330970	CenturyTel of the Midwest-Wisconsin (Wayside)	wi (	
	63	T162	330924	CenturyTel of the Midwest-Kendall, LLC	WI	801408
	84	T163	310689	CenturyTel of Upper Michigan, Inc.	МІ	815632
	65	T164	361445	CenturyTel of Minnesota, Inc.	MN	805554
	86	T165	351274	CenturyTel of Postville, Inc.	IA	805557
	-	T800		CenturyTel of Alabama, LLC (legal entity for T801 & T802)	AL	822566
	. 87	T801	259789	Century Tel of Northern Alabama	AL	
	05	T802	259788	CenturyTel of Southern Alabama	AL	ļ <b>,</b>
		T803	2031 00	CenturyTel of Missouri, LLC (legal entity for T804, T805, T806 & T807)	WO	822568
	69	T804	429785	CenturyTel of Belie-Hermann	MO	
					мо	
	70 71	T805	429786	CenturyTel of Southern Missouri	MO	
	71 72	T806 T807	429787 429784	CenturyTel of Southwest Missouri CenturyTel of Central Missouri	MO	
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# Customer Proprietary Network Information (CPNI)

**Compliance Manual and Operating Procedures** 



- I. Definitions
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- IV. Guidelines for Use of CPNI
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### I. <u>DEFINITIONS</u>

**Affiliate:** A person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. The term "own" means to own an equity interest (or the equivalent thereof) of more than 10 percent.

Carrier: See Telecommunications Carrier.

**CMRS:** Commercial Mobile Radio Service.

**Communications-Related Services:** Telecommunications services, information services typically provided by telecommunications carriers, and services related to the provision or maintenance of customer premises equipment.

Company: CenturyTel.

**Customer:** A person or entity to which a telecommunications carrier is currently providing service.

Customer Proprietary Network Information (CPNI): Information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and Information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier. CPNI does not include subscriber list information.

Customer Premises Equipment: Equipment employed on the premises of a person (other than a carrier) to originate, route, or terminate telecommunications.

FCC: Federal Communications Commission.

Information Service: The offering of a capability for generating, acquiring, storing, transforming, processing, retrieving, utilizing, or making available information via telecommunications, and includes electronic publishing, but does not include any use of any such capability for the management, control, or operation of a telecommunications system or the management of a telecommunications service.

Information Services Typically Provided by Telecommunications Carriers: Information services that telecommunications carriers typically provide, such as Internet access or voice mail services. The term does not



include retail consumer services provided using Internet websites (such as travel reservation services or mortgage lending services), whether or not such services might otherwise be considered to be information services.

Local Exchange Carrier: Any person engaged in the provision of telephone exchange service or exchange access. Such term does not include a person insofar as such person is engaged in the provision of a commercial mobile service (except to the extent that the FCC determines that such service should be included in the definition of the term).

**Opt-In Approval:** A method for obtaining customer consent to use, disclose, or permit access to the customer's CPNI. This approval method requires that the carrier obtain the customer's affirmative, express consent allowing the requested CPNI usage, disclosure, or access after the customer is provided appropriate notification of the carrier's request.

**Opt-Out Approval:** A method for obtaining customer consent to use, disclose, or permit access to the customer's CPNI. Under this approval method, a customer is deemed to have consented to the use, disclosure, or access to the customer's CPNI if the customer has failed to object thereto within the prescribed waiting period, after the customer is provided appropriate notification of the carrier's request for consent.

Subscriber List Information: Any information (1) identifying the listed names of a carrier's subscribers and the subscribers' telephone numbers, addresses, or primary advertising classifications (as such classifications are assigned at the time of the establishment of such service), or any combination of such listed names, numbers, addresses, or classifications; and (2) that the carrier or an affiliate has published, caused to be published, or accepted for publication in any directory format.

**Telecommunications Carrier:** Any provider of telecommunications services, except that such term does not include aggregators of telecommunications services (as defined in 47 USC 226).

**Telecommunications Service:** The offering of telecommunications for a fee directly to the public, or to such classes of users as to be effectively available directly to the public, regardless of the facilities used.



#### II. Statement of Corporate Policy

The policy of CenturyTel is to comply with the letter and spirit of all laws of the United States, including those pertaining to CPNI contained in § 222 of the Telecommunications Act of 1996, as amended, 47 USC 222, and the FCC's regulations, 47 CFR 64.2001-.2009. The Company's policy is to rely on the involvement of high-level management to ensure that no use of CPNI is made until a full review of applicable law has occurred.

The FCC's regulations, 47 CFR 64.2009, require the Company to implement a system to clearly establish the status of a customer's CPNI approval prior to the use of CPNI, and to train its personnel as to when they are, and are not, authorized to use CPNI, and to have an express disciplinary process in place. This Manual constitutes the Company's policies and procedures related to CPNI.

All employees are required to follow the policies and procedures specified in this Manual.

- Any questions regarding compliance with applicable law and this Manual should be referred to Robert Shannon at (318) 330-6252.
- Any violation of, or departure from, the policies and procedures in this Manual shall be reported immediately to Robert Shannon at (318) 330-6252.



## III. <u>Use of CPNI in General</u>

Except as otherwise described in this Manual, when the Company receives or obtains CPNI by virtue of its provision of a telecommunications service, it can only use, disclose, or permit access to individually identifiable CPNI in its provision of:

- 1. The telecommunications service from which the information is derived; or
- 2. Services necessary to, or used in, the provision of the telecommunications service, including the publishing of directories.



## IV. Guidelines for Use of CPNI

- A. The Company may not use, disclose, or permit access to CPNI to market service offerings to a customer that are within a category of service to which the customer does not already subscribe from the Company, unless the Company has customer approval to do so (except that no customer approval is necessary in the situations described in IV.D.).
- B. The Company cannot use, disclose or permit access to CPNI to identify or track customers that call competing service providers. Thus, the Company may not use local service CPNI to track all customers that call its local service competitors.
- C. The Company may use, disclose, or permit access to CPNI for the purpose of providing or marketing service offerings among the categories of service (i.e., local, interexchange, and CMRS) to which the customer already subscribes from the Company, without customer approval.
  - 1. If the Company provides different categories of service, and a customer subscribes to more than one category of service offered by the Company, the Company may share CPNI among its affiliated entities that provide a service offering to the customer, without customer approval.
  - 2. If the Company provides different categories of service, but a customer does not subscribe to more than one offering by the carrier, the carrier is not permitted to share CPNI with its affiliates, except with the customer's approval as discussed in V., below.
- D. The Company may use, disclose, or permit access to CPNI, without customer approval, as described below:
  - 1. To provide inside wiring installation, maintenance, and repair services.
  - 2. CMRS providers may use, disclose, or permit access to CPNI for the purpose of conducting research on the health effects of CMRS.
  - 3. To market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking,



call waiting, caller I.D., call forwarding, and Centrex features.

- 4. For the provision of customer premises equipment and call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, and protocol conversion.
- 5. To protect the rights or property of the carrier, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.
- 6. Initiate, render, bill and collect for telecommunications services;
- 7. Provide call location information concerning the user of a commercial mobile service in emergency situations; and



### V. Obtaining Customer Approval for Use of CPNI

## A. Soliciting Customer Approval

The Company may obtain approval through written, oral or electronic methods.

- If the Company relies on oral approval, it bears the burden of demonstrating that such approval has been given in compliance with the FCC's regulations.
- A customer's approval or disapproval to use, disclose, or permit access to CPNI must remain in effect until the customer revokes or limits such approval or disapproval.
- 3. The Company must maintain records of approval, whether oral, written or electronic, for at least one year.

#### B. Use of Opt-Out and Opt-In Approval Processes

- The Company may utilize the opt-out or opt-in method to obtain approval to use its customer's individually identifiable CPNI for the purpose of marketing communications-related services to that customer.
- 2. The Company may also utilize the opt-out or opt-in method to obtain approval to disclose its customer's individually identifiable CPNI, for the purpose of marketing communications-related services to that customer, to its agents, to its affiliates that provide communications-related services, and to its joint venture partners and independent contractors.
- 3. If the Company discloses or provides access to CPNI to a joint venture partner or independent contractor, in addition to obtaining customer approval, it must enter into confidentiality agreements with such contractors or partners. The confidentiality agreement must:
  - Require that the independent contractor or joint venture partner use the CPNI only for the purpose of marketing or providing the communications-related services for which the Company has provided the CPNI;



- ii. Disallow the independent contractor or joint venture partner from using, allowing access to, or disclosing the CPNI to any other party, unless required to make such disclosure under force of law; and
- iii. Require that the independent contractor or joint venture partner have appropriate protections in place to ensure the ongoing confidentiality of consumers' CPNI.



## VI. Notices Required for Use of CPNI

## A. Mandatory Notices Regarding Solicitation

- Prior to soliciting any customer approval to use, disclose, or permit access to customers' CPNI, the Company must notify the customer of the customer's right to restrict use of, disclosure of, and access to, the customer's CPNI.
- 2. The Company must maintain records of the notification, whether oral, written or electronic, for at least one year.
- Content of Notice: Customer notification must provide sufficient information to enable the customer to make an informed decision whether to permit a carrier to use, disclose, or permit access to, the customer's CPNI. The notification must:
  - i. State that the customer has a right, and the Company has a duty, under federal law, to protect the confidentiality of CPNI.
  - ii. Specify the types of information that constitute CPNI and the specific entities that will receive the CPNI, describe the purposes for which CPNI will be used, and inform the customer of the right to disapprove those uses, and deny or withdraw access to CPNI at any time.
  - iii. Advise the customer of the precise steps the customer must take in order to grant or deny access to CPNI, and must clearly state that a denial of approval will not affect the provision of any services to which the customer subscribes. However, the Company may provide a brief statement, in clear and neutral language, describing consequences directly resulting from the lack of access to CPNI.
  - iv. Be comprehensible and not misleading
  - v. State that any approval or denial of approval for the use of CPNI outside of the service to which the customer already subscribes from that carrier is valid until the customer affirmatively revokes or limits such approval or denial.



- 4. If written notification is provided, the notice must be clearly legible, use sufficiently large type, and be placed in an area so as to be readily apparent to a customer.
- 5. If any portion of a notification is translated into another language, then all portions of the notification must be translated into that language.
- 6. The Company may state in the notification that the customer's approval to use CPNI may enhance the carrier's ability to offer products and services tailored to the customer's needs. The Company also may state in the notification that it may be compelled to disclose CPNI to any person upon affirmative written request by the customer.
- 7. A carrier may not include in the notification any statement attempting to encourage a customer to freeze third-party access to CPNI.
- 8. The Company's solicitation for approval must be proximate to the notification of a customer's CPNI rights.

#### A. Opt-Out Notice Requirements

The Company must provide notification to obtain opt-out approval through electronic or written methods, but not by oral communication (except for one-time use of CPNI, as discussed in VI.E., below). The contents of any such notification must comply with the requirements of VI.A.3., above.

- 1. The Company must wait a 30-day minimum period of time after giving customers notice and an opportunity to opt-out before assuming customer approval to use, disclose, or permit access to CPNI. The Company may, in its discretion, provide for a longer period. The Company must notify customers as to the applicable waiting period for a response before approval is assumed.
  - i. In the case of an electronic form of notification, the waiting period begins to run from the date on which the notification was sent.
  - ii. In the case of notification by mail, the waiting period begins to run on the third day following the date that the notification was mailed.



- 2. If the Company uses the opt-out mechanism it must provide notices to its customers every two years.
- 3. Use of E-mail: If the Company uses e-mail to provide opt-out notices, it must comply with the following additional requirements:
  - i. The Company must have express, verifiable, prior approval from consumers to send notices via e-mail regarding their service in general, or CPNI in particular;
  - ii. Customers must be able to reply directly to e-mails containing CPNI notices in order to opt-out.
  - iii. Opt-out e-mail notices that are returned to the Company as undeliverable must be sent to the customer in another form before the Company may consider the customer to have received notice; and
  - iv. The subject line of the e-mail must clearly and accurately identify the subject matter of the e-mail.
  - v. The Company must make available to every customer a method to opt-out that is of no additional cost to the customer and that is available 24 hours a day, seven days a week. The Company may satisfy this requirement through a combination of methods, so long as all customers have the ability to opt-out at no cost and are able to effectuate that choice whenever they choose.

## D. Opt-In Notice Requirements

The Company may provide notification to obtain opt-in approval through oral, written, or electronic methods. The contents of any such notification must comply with the requirements described in § VI.A.3., above.

## E. Notice Requirements Specific to One-Time Use of CPNI

1. The Company may use oral notice to obtain limited, onetime use of CPNI for inbound and outbound customer telephone contacts for the duration of the call, regardless of whether carriers use opt-out or opt-in approval based on the nature of the contact.



- 2. The contents of any such notification must comply with the requirements of VI.A.3., except that the Company may omit any of the following if not relevant to the limited use for which the carrier seeks CPNI:
  - i. The Company need not advise customers that if they have opted-out previously, no action is needed to maintain the opt-out election.
  - ii. The Company need not advise customers that it may share CPNI with its affiliate(s) or third parties and need not name those entities, if the limited CPNI usage will not result in use by, or disclosure to, an affiliate or third party.
  - iii. Carriers need not disclose the means by which a customer can deny or withdraw future access to CPNI, so long as carriers explain to customers that the scope of the approval the carrier seeks is limited to one-time use.
  - iv. Carriers may omit disclosure of the precise steps a customer must take in order to grant or deny access to CPNI, as long as the carrier clearly communicates that the customer can deny access to his CPNI for the call.
- F. Except for use and disclosure of CPNI that is permitted without customer approval as discussed above, and except for the purpose of marketing <u>communications-related</u> services to a customer, the Company may only use, disclose, or permit access to a customer's individually identifiable CPNI subject to opt-in approval.



## VII. Company Safeguards and Recordkeeping Requirements

## A. Management Safeguards

- 1. Training of Company personnel will include review of this Manual by all new employees and all existing employees who have not previously done so.
- 2. The Company will provide additional training on an asneeded basis.
- 3. Company personnel will make no decisions regarding CPNI without first consulting one of the following individuals:

Robert Shannon, Manager-Federal Government Relations

The Company's personnel must obtain supervisory approval from a person listed above regarding any proposed use of CPNI.

- 4. In deciding whether the contemplated use of the CPNI is proper, the individual(s) listed in the previous paragraph will consult this manual, applicable FCC regulations or Compliance Guide, and, if necessary, legal counsel.
- 5. The person(s) listed in VII.A.3. above will personally oversee the use of approval methods and notice requirements for compliance with all legal requirements.
- 6. The person(s) listed in VII.A.3. above will also ensure that the Company enters into confidentiality agreements, as necessary, with any joint venture partners or independent contractors to whom it discloses or provides access to CPNI.
- 7. Any improper use of CPNI will result in disciplinary action in accordance with established Company disciplinary policies. Any improper use shall be treated as a serious offense, and may result in suspension or termination of employment in appropriate cases. Any company personnel making improper use of CPNI will undergo additional training to ensure future compliance.
- 8. The Company will provide written notice within five business days to the FCC and/or the appropriate State Commission of any instance where the opt-out mechanisms do not work



properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

- i. The notice will be in the form of a letter, and will include the Company's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.
- ii. The Company must submit the notice even if the Company offers other methods by which consumers may opt-out.
- 9. On an annual basis, a corporate officer of the Company will sign a compliance certificate (Appendix 1) stating that the officer has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the FCC's rules.
- 10. The Company will review these procedures on a continuing basis to ensure compliance with all FCC regulations, and will revise these procedures as needed to reflect any subsequent revisions to the applicable Rules and Regulations addressing CPNI.

#### B. Recordkeeping

- 1. The Company will maintain records of its own sales and marketing campaigns that use CPNI in files clearly identified as such. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The Company will maintain these records in its offices for a minimum of one year.
- The Company will maintain records of its affiliates' sales and marketing campaigns that use CPNI in files clearly identified as such. These records will include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The Company will maintain these records in its offices for a minimum of one year.



- 3. The Company will maintain records of all instances where it disclose or provides CPNI to third parties, or where third parties are allowed access to CPNI, in files clearly identified as such. These records will include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The Company maintains these records in its offices for a minimum of one year.
- 4. The Company's policy is to maintain records of customer approval for use of CPNI, as well as notices required by the FCC's regulations, for a minimum of one year. The Company maintains records of customer approval and disapproval for use of CPNI in a readily-available location that is consulted on an as-needed basis.
- 5. The Company will maintain separate files in which it will retain any court orders respecting CPNI.



#### APPENDIX 1

#### Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for [year]

Date filed: [date]

Name of company(s) covered by this certification: [company]

Form 499 Filer ID: [provide ID(s)]

Name of signatory: [name]

Title of signatory: [title]

I, [name of officer signing certification], certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company [is/ is not] in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules [attach accompanying statement].

The company [has/has not] taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

If affirmative: [Provide explanation of any actions taken against data brokers]

The company [has/has not] received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

If affirmative: [Provide summary of all customer complaints received in the past year concerning the unauthorized release of CPNI.]

Signed	[signature]



## **APPENDIX 2**

# Employee Verification

	Employee Signature
	s Customer Proprietary Network Information Procedures and agree to comply with the
Date:	
Employee Name:	



#### **APPENDIX 3**

#### **OPT-OUT NOTICE**

An Important Announcement for CenturyTel Customers

Recent changes in government regulations allow CenturyTel to use information about your current telecommunications services to keep you informed of the latest products and services that will best meet your future needs. This information includes things such as the types of services and features you use, the way we provide these services to you, and calling and billing records.

We would like to share your information among the CenturyTel family of companies for the purpose of keeping you informed about innovative service offerings and exciting new packages including local service, long distance, high-speed data services and internet access. This will allow you to stay abreast of the latest technology and enhance or change the way you communicate with your family, friends and business associates. You may also receive information on how to save money on these products and services.

By federal law, you have the right, and CenturyTel has a duty, to protect the confidentiality of information regarding your telecommunications services. Only those companies that now or in the future sell CenturyTel services, including our agents and authorized sales representatives, will use this information.

If you do not want CenturyTel to share your information with our subsidiaries, all you have to do is call 1-800-xxx-xxxx and follow the prompts. Your selection will be noted on your account and will remain in effect until you withdraw it. If you have elected to not have CenturyTel share your information with our subsidiaries (opt-out) in the past, no action is required on your part to maintain the opt-out election. However, consumers who wish to reverse their previous decision to opt-out, or consumers who have not previously opted out but wish to do so, must take action as described in this notice. Whatever you decide, CenturyTel will continue to provide you with the highest quality of service possible.

Thank you for using CenturyTel. We look forward to serving you even more effectively with new communications opportunities and solutions.